

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

GERARD KENNEY, ALEXA JOSHUA, GLEN
DELA CRUZ MANALO, and KATHERINE
MURRAY LEISURE,

Plaintiffs,

v.

AMERICAN BOARD OF INTERNAL
MEDICINE,

Defendant.

**JOINT STIPULATION FOR AN EXTENSION OF TIME
TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiffs and defendant American Board of Internal Medicine (“ABIM”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, the Complaint in this action was filed on December 6, 2018;

WHEREAS, on January 2, 2019 counsel for Plaintiffs filed a waiver of the service of summons sent to ABIM on December 18, 2018, indicating counsel for ABIM accepted service of the summons and complaint as of December 18, 2018;

WHEREAS, ABIM agreed pursuant to the waiver of service of summons to answer or otherwise respond to the complaint within 60 days of service, making ABIM's response due on February 19, 2019;

WHEREAS, counsel for Plaintiffs and ABIM agreed to a thirty-day extension of time within which to respond to the complaint, making ABIM's response due on March 18, 2019;

WHEREAS, the Court entered an Order setting March 18, 2019 as the date for ABIM's response to the Complaint (D.E. 17);

WHEREAS, Plaintiffs filed an Amended Complaint in this action on January 23, 2019;

IT IS HEREBY STIPUALTED AND AGREED by the parties, subject to the approval of the Court, that the time for ABIM to respond to the Complaint shall remain as initially stipulated and ABIM's response shall be due March 18, 2019.

February 1, 2019

Respectfully submitted,

/s/ Mindee J. Reuben

Steven J. Greenfogel
Mindee J. Reuben
LITE DEPALMA GREENBERG, LLC
1835 Market Street – Suite 2700
Philadelphia, PA 19103
Phone: 267.519.8306

Katrina Carroll
LITE DEPALMA GREENBERG, LLC
111 West Washington
Suite 1240
Chicago, IL 60602
Phone: 312.750.1265

C. Phillip Curley
Alan F. Curley
Cynthia H. Hyndman
Samuel G. Royko
ROBINSON CURLEY, P.C.
South Wacker Drive, Suite 1700
Chicago, IL 60606
Tel: 312.663.3100

*Attorneys for Plaintiffs. Gerard Kenney,
Alexa Joshua, Glen Dela Cruz Manalo,
and Katherine Murray Leisure*

/s/ Jason A. Leckerman

Leslie E. John
Jason A. Leckerman
Elizabeth P. Weissert
Mansi Shah
BALLARD SPAHR LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103
Phone: 215-665-8500

*Attorneys for Defendant,
American Board of Internal Medicine*

SO ORDERED this 1st day of February,
2019

Robert F. Kelly
Robert F. Kelly, U.S.D.J.